
From: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Sent: Monday, July 8, 2024 5:54 PM
To: Blumm, Nicky
Cc: Armstrong, Iain
Subject: Re: [EXT] Slevin v. AB Hollywood

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I filed it today.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 07/08/2024 5:42 PM PDT Blumm, Nicky <nicky.blumm@lewisbrisbois.com> wrote:

Hi Jessica,

We see from Pacer that you have not yet filed the stipulated dismissal. Our client has had second thoughts and has withdrawn his permission to agree to stipulate to a dismissal at this time. Accordingly, please do not file the dismissal.

We will be in touch once we have had an opportunity to meet with him regarding the state of the litigation.

Thank you.

Cheers,
Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com
T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | [LewisBrisbois.com](https://www.LewisBrisbois.com)

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by **DIVERSITYLAB**

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>
Sent: Wednesday, July 3, 2024 11:29 AM
To: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Subject: RE: [EXT] Slevin v. AB Hollywood

Hi Jessica,

My client consents to filing the dismissal. Thank you.

Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com

T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | [LewisBrisbois.com](https://lewisbrisbois.com)

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by DIVERSITYLAB

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: JESSICA MOLLIGAN <jessicamolligan@comcast.net>

Sent: Monday, July 1, 2024 3:48 PM

To: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>

Subject: RE: [EXT] Slevin v. AB Hollywood

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Please see attached and let me know if it is acceptable to file.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 07/01/2024 3:32 PM PDT Blumm, Nicky <nicky.blumm@lewisbrisbois.com> wrote:

I will sign.

Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com
T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | [LewisBrisbois.com](https://www.LewisBrisbois.com)

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by DIVERSITYLAB

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Sent: Monday, July 1, 2024 3:29 PM
To: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>
Cc: Armstrong, Iain <Iain.Armstrong@lewisbrisbois.com>
Subject: RE: [EXT] Slevin v. AB Hollywood

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, by validating its authenticity.

We are dismissing this case. I'll send over a Stipulated Dismissal shortly. Which of you will be signing?

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 07/01/2024 1:49 PM PDT Blumm, Nicky <nicky.blumm@lewisbrisbois.com> wrote:

Hi again Jessica,

I am following up on my previous email regarding our settlement agreement. Are you able to send me a complete PDF version of the settlement agreement with your client's signature?

Thank you for your swift response.

Cheers,
Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com
T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by DIVERSITYLAB

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>
Sent: Thursday, June 20, 2024 2:41 PM
To: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Cc: Armstrong, Iain <Iain.Armstrong@lewisbrisbois.com>
Subject: RE: [EXT] Slevin v. AB Hollywood

Hi Jessica,

Thank you for your email.

Would you mind sending an updated version of the **complete** PDF, including both the agreement and the signature page? The updated version attached is exactly the same as the previous version which you signed, except that this version contains an updated date by which payment is due.

Additionally, we require **your client's signature** on the signature block, rather than your signature with the POA notation. Consistent with model rules of professional conduct (see Rule 1.2 and 1.4), we need verification that your client has reviewed the offer and accepts, given that his rights are directly affected by the settlement.

Appreciating your swift response.

Cheers,
Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com
T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by DIVERSITYLAB

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Sent: Tuesday, June 18, 2024 3:25 PM
To: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>
Cc: Armstrong, Iain <Iain.Armstrong@lewisbrisbois.com>
Subject: RE: [EXT] Slevin v. AB Hollywood

Hello,
Please see attached signature page.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 06/13/2024 11:03 AM PDT Blumm, Nicky <nicky.blumm@lewisbrisbois.com>
wrote:

Hi again Jessica,

I generally revised the agreement to remove superfluous sections and be more specific as to the obligations for my client. In the updated version (attached) I removed the “as to form” component per your request.

Thank you.

Cheers,
Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com
T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.



This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Sent: Wednesday, June 12, 2024 4:35 PM
To: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>
Cc: Armstrong, Iain <Iain.Armstrong@lewisbrisbois.com>
Subject: RE: [EXT] Slevin v. AB Hollywood

The only "revision" I see is that you added my signature line "as to form." I don't want that in there and don't see the need for it.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 06/12/2024 3:04 PM PDT Blumm, Nicky
<nicky.blumm@lewisbrisbois.com> wrote:

Hi again Jessica,

Apologies for the delay, it's been a busy week.

Please find a revised Agreement attached. Once we have the signed version, we will send the check.

Thanks in advance.

Cheers,
Nicky



Nicky Blumm (He/Him)
Attorney
Nicky.Blumm@lewisbrisbois.com

T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | [LewisBrisbois.com](https://www.LewisBrisbois.com)

Representing clients from coast to coast. View our locations nationwide.



This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: JESSICA MOLLIGAN <jessicamolligan@comcast.net>
Sent: Monday, June 10, 2024 6:58 PM
To: Blumm, Nicky <Nicky.Blumm@lewisbrisbois.com>
Cc: Armstrong, Iain <Iain.Armstrong@lewisbrisbois.com>
Subject: RE: [EXT] Slevin v. AB Hollywood

Hello,
Following up on the Settlement Agreement sent last Tuesday.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 06/04/2024 4:20 PM PDT JESSICA MOLLIGAN
<jessicamolligan@comcast.net> wrote:

Please see attached.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office

On 06/04/2024 3:26 PM PDT Blumm,
Nicky
<nicky.blumm@lewisbrisbois.com>
wrote:

Hi Jessica,

I am hoping to receive your proposed
Settlement Agreement so that I can pass it to
my client for approval. Thanks for your swift
response.

Cheers,
Nicky



Nicky Blumm
Attorney
Nicky.Blumm@lewisbrisbois.com
T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | [LewisBrisbois.com](https://www.LewisBrisbois.com)

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by DIVERSITYLAB

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient

not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: JESSICA MOLLIGAN
<jessicamolligan@comcast.net>
Sent: Tuesday, June 4, 2024 10:11 AM
To: Blumm, Nicky
<Nicky.Blumm@lewisbrisbois.com>
Cc: Armstrong, Iain
<Iain.Armstrong@lewisbrisbois.com>
Subject: RE: [EXT] Slevin v. AB Hollywood

Nicky,
We agreed to settle this matter for
\$1000 in attorney fees. If you mean the
Settlement Agreement, I should have
that over to you today.

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell

On 06/04/2024 10:07 AM
PDT Blumm, Nicky
<nicky.blumm@lewisbrisbois.com> wrote:

Hi again Jessica,

When we spoke on Friday, you mentioned that you would send us a settlement offer. When can my client expect to receive that offer?

Thank you!

Cheers,
Nicky



Nicky Blumm
Attorney

Nicky.Blumm@lewisbrisbois.com

T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.

Mansfield Rule
Certified 2022-2023 Powered by DIVERSITYLAB

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are requested to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message was stored.

From: Blumm, Nicky
<Nicky.Blumm@lewisbrisbois.com>
Sent: Thursday, May 30, 2024
6:40 PM
To: JESSICA MOLLIGAN
<jessicamolligan@comcast.net>
; Armstrong, Iain
<Iain.Armstrong@lewisbrisbois.com>
Subject: Re: [EXT] Slevin v. AB
Hollywood

Hi Jessica,

I will give you a call before
9am tomorrow. My
apologies for the delay.

Thank you for your
patience.

Cheers,
Nicky



Nicky Blumm
Attorney
Nicky.Blumm@lewisbrisbois.com

T: 971.334.7009 F: 971.712.2801

888 SW Fifth Avenue, Suite 900, Portland, OR 97204-2025 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are requested to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message was stored.

From: JESSICA MOLLIGAN
<jessicamolligan@comcast.net>
Sent: Thursday, May 30, 2024
5:51:19 PM
To: Blumm, Nicky
<Nicky.Blumm@lewisbrisbois.com>; Armstrong, Iain
<Iain.Armstrong@lewisbrisbois.com>
Subject: [EXT] Slevin v. AB
Hollywood

Hello,
I was really hoping to hear
back from one of you by
now. When do you think
you would be able to get
back to me?

Thank you,

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292

(971) 350-7347 Office
(503) 975-2920 Cell